Photograph 4.3 Ian Buckley Rainforest area, viewed from west boundary, facing west

Photograph 4.4 Mature tree plantings, viewed from south boundary, facing south east

Photograph 4.5 Playing field, viewed from south boundary, facing north west

4.2 1891 weatherboard schoolhouse and the former 1907 Cudgera Creek schoolhouse (Building A)

Building A, consisting of the 1891 weatherboard schoolhouse and the former 1907 Cudgera Creek schoolhouse at Tumbulgum Public School (Photograph 4.6 to Photograph 4.11) is a vernacular timber structure that historically served as a schoolhouse and was used as classrooms until the 2022 floods. It remains a central focal point of the school, surrounded by modern facilities, some of which are located as close as one meter from the building. Architecturally, it exemplifies the rural schoolhouse design typical of the late nineteenth and early twentieth centuries, featuring a symmetrical layout and multi-paned sash windows on all elevations.

The structure is primarily clad in timber weatherboards, supported by timber bearers and joists elevated above flood-prone ground on a concrete pad. The interior flooring of Building A is tongue and groove timber flooring. Key architectural features include timber boxed eaves, expansive sash windows, and high ceilings, all of which contribute to its distinctive vernacular style. The steeply pitched gabled roof, clad in corrugated iron, is a hallmark of the period, with subtle timber accents at the gable apex enhancing its character.

Although generally in good condition, Building A is situated below the flood planning level, making it vulnerable to flooding (Henry & Hymas Consulting Engineers, 2024b, p.1).

Photograph 4.6 1891 weatherboard schoolhouse (Building A), viewed from the south boundary, facing south west

Photograph 4.7 1891 weatherboard schoolhouse (Building A), viewed from the interior, facing north west

Photograph 4.8 Former 1907 Cudgera Creek school building (Building A), viewed from the south boundary, facing south west

Photograph 4.9 Former 1907 Cudgera Creek school building (Building A), viewed from the interior, facing north

Photograph 4.10 Connection to the former 1907 Cudgera Creek school building

(Building A), viewed from the interior, facing north

4.3 Landscape

The landscaping elements at Tumbulgum Public School, as outlined in the *Arboricultural Impact Assessment* (Northern Tree Care, 2024) include a variety of significant tree species, most of which are positioned around the perimeter of the school. These include notable mature species with high retention value such as Pecan, Davidson Plum and Camphor Laurel, Tea, Rainforest and Macadamia trees (*Macadamia integrifolia*). Many of these trees are in good condition and have been assigned high retention values.

Photograph 4.11 General landscaping, viewed from the east boundary, facing east

Photograph 4.12 General landscaping, viewed from the south boundary, facing north

Photograph 4.13 Lone Pine from Gallipoli descendant, viewed from the east boundary, facing east

Photograph 4.14 General landscaping, viewed from the north boundary, facing south

5 Archaeological potential

5.1 Introduction

This section determines if archaeological resources and/or relics are likely to exist in the project area that may be impacted by the proposed activity, and to assess whether these resources are of significance. The following assessment of archaeological potential is based on the definitions of 'relics' as outlined in Section 4(1) of the *Heritage Act* (as amended 2009), as they apply to the particular historical setting of the project area, and applies the definitions of potential and disturbance presented in Table 5.1 and Table 5.2. Where there are high and moderate levels of archaeological potential in combination with nil, low or moderate levels of disturbance, the area holds archaeological sensitivity. These areas are shown on Figure 5.1. To determine whether the potential archaeological resources in the areas of sensitivity are likely to be relics, as defined by the Heritage Act, a significance assessment is provided in Section 6.

Table 5.1 Levels of archaeological potential applied to potential resources in the project area

Level of Archaeological Potential	Explanation
High	Known, intensive activity has occurred (during the historical phase) that is likely to result in an archaeological resource. The activity is geographically constrained and is not likely to have been subject to subsequent disturbance.
Moderate	Known activity likely to result in an archaeological resource has occurred (during the historical phase). The activity is geographically constrained but may have been subject to subsequent disturbance.
Low	Known activity that may have resulted in an archaeological resource has occurred (during the historical phase). The activity is not geographically constrained and/or is likely to have been subject to substantial subsequent disturbance.
Nil	No known historical activity has been identified within a geographically constrained area that is likely to result in an archaeological resource and/or an area where subsequent subsurface impacts have been extensive.

•

Table 5.2 Definitions of disturbance levels informing assessment of archaeological potential

Level of Disturbance	Definition
High	The historical site or feature has been subject to subsequent development that clearly demonstrates subsurface disturbance has taken place that would have a major impact on any archaeological deposits or relics.
Moderate	The historical site or feature has been subject to subsequent development that clearly demonstrates subsurface disturbance that would have an impact on any archaeological deposits or relics, however, archaeological evidence may remain.
Low	The historical site or feature has been subject to subsequent development however known subsurface disturbance has not been identified.
Nil	The historical site or feature has been subject to no known subsequent development of subsurface impacts that would have a direct impact on any archaeological deposits or relics.

DRAFT

5.2 Historical phases

Historical analysis has allowed for the land use of the project area to be divided into development phases. These phases provide a framework for understanding archaeological potential.

- Phase 1 – William Baker tenure (1879-1882)
- Phase 2 – Subdivision (1882-1891)
- Phase 3 – First School 1872–1891
- Phase 4 – Public School (1891-present)

5.2.1 Phase 1: William Baker tenure 1879–1883

Land clearance for later subdivision and potential cane or other farming have likely impacted archaeological resources of early cedar getting in the project area. If archaeological resources associated with Phase 1 survive it is likely the result of Baker's farming. Archaeological resources may include evidence such as burn layers, post holes, hand tools and historic fence posts. Later development of the site may have is likely to have had a moderate to high level of disturbance across the site. As such, there is *low* to *nil* potential for archaeological resources associated with this phase to survive on site.

5.2.2 Phase 2: Subdivision 1883-1891

Archaeological resources associated with the act of subdivision may include survey marks on remnant trees and survey equipment. The majority of subdivision landholders were not living of their properties, nevertheless, archaeological resources from this period may include remnant fence lines and evidence of farming such as plough furrows. The construction and updating of school structures from 1891/1892 into the 2000s would have impacted archaeological resources associated with subdivision landholders. Lack of permanent occupation and later impacts indicate the potential for archaeological resources from Phase 2 is considered to be *low to nil* over the majority of the project area.

Norton's cottage, however, was located in close proximity to the teacher's residence toilet and it can be inferred that the cottage may have been in or just outside the late nineteenth century teacher's residence yard. Land in the vicinity of the late nineteenth century teacher's residence has experienced variable impacts into the present, including the construction of the septic toilets and effluent disposal area, and the planting of trees along the western boundary.

The cottage was dismantled in 1894 but evidence of footings and occupation, such as rubbish deposits, may survive as archaeological resources in this area. There has been moderate disturbance to this particular archaeological resource. Therefore, potential for archaeological resources associated with Norton's occupation is considered to be *low*.

5.2.3 Phase 3: First School 1872–1891

Schooling in the Tumbulgum area first occurred in make-shift school rooms in private residences. The first Tumbulgum Public Schoolhouse and teacher's residence were built in North Tumbulgum in 1875. The weathershed was transported from the first public school to the new school in 1891. It was blown down in 1929 and re-erected by the community. It is likely that the weathershed is the structure in the middle of the site as shown in the 1954 aerial of the site. It was removed from the site in 1956 and its absence, and the structure in the middle of the site is missing on the 1963 plan of the site. This has been impacted by the hardcourt and temporary school buildings now on the site. This can be seen as a moderate to high level of disturbance to the weathershed site. The archaeological potential for this phase of the school is *low*.

5.2.4 Phase 4: Current Public School 1891–present

The shift of the Tumbulgum township from North Tumbulgum to the modern township resulted in the resumption of subdivided land for the Tumbulgum Public School in 1891. There is no evidence to suggest that the location and allotment of the school has been changed since the initial location of the site.

Building A, constructed in 1892, has undergone numerous repairs and additions over the years. In 1912, additional classrooms and facilities were added. The building sustained damage from floods in 1931 and was subsequently raised onto a platform in 1950. Further repairs and the addition of a verandah were completed in 1959. In 1991, a permanent wall was installed to divide two classrooms. Most recently, in 2008, Building A suffered minor damage due to a fire. The subfloor area is also situated on top of a concrete pad, further disturbing any potential underfloor deposits associated with Building A

Two toilet blocks dated to pre-1963 can be seen in the 1954 aerial imagery of Tumbulgum (Plate 3.13). These buildings are also shown in the 1963 plan of the proposed upgrade to the toilet blocks and connection to the Murwillumbah water main. They were demolished and removed in these upgrade works and since the area to the west has been impacted by hard court ball equipment.

An aerial photograph of the school site from 1954 and 1967 (Plate 3.13 - Plate 3.14) shows the original teachers residence and the classroom building (Building A; Plate 3.15). The teachers' residence was demolished and replaced by 1969 and in 1991 a rainforest area was established in the location where the original teachers' residence was located.

The Cudgera school was relocated to the site in 1977 and placed on a raised platform with a walkway built to connect it to the existing classroom buildings. The archaeological deposit that would have existed at the former school site would not have been transferred with this structure and there is nil potential for archaeological deposits relating to Cudgera to exist on site.

DRAFT

5.3 Archaeological potential

The potential for archaeological resources to survive in the Tumbulgum Public School curtilage was predicted in the Baseline Historical Assessment (EMM 2022) and has been amended based on additional research completed for this assessment. Documentary research undertaken for these reports strongly suggests that:

- in 1879 the land was first taken up by settler William Baker. The project area and surrounding area was undeveloped; therefore the potential for relics relating to Phase 1 (1869–1882) is *low to nil*

- the project area was taken up by settlers following subdivision in 1883. The seven of the eight landholders did not reside on their properties but may have farmed the land, which may have left ephemeral evidence in the archaeological record such as furrows and fence line post holes. Mr Norton resided in a cottage on the property and archaeological resources associated with the structure may include evidence of footings and rubbish deposits. Archaeological resources this phase would likely have been disturbed by later development. As such, the potential for relics relating to Phase 2 (1883-1891) is anticipated to be *low.*

- the first school rooms, public school and teacher's residence were built outside the current school boundary but the weather shed was transferred to the current site in 1891/1892. It was damaged and re-erected in 1929 and demolished in 1956. Currently a hardcourt and temporary classroom have been established on this site and likely impact this area. Therefore the potential for relics relating to Phase 3 (1872–1891) is *low* to *nil.*

- The earliest buildings in this phase, excluding Building A, dating to the late nineteenth century/ early twentieth century have all been demolished and removed from site with later development impacting the area.

- Building A may underfloor deposits related to the earliest phase of schooling, however the building was raised above flood level in 1950 and now is situated on a concrete pad and this activity is likely to have disturbed this archaeological deposit.

- The original teachers' residence was removed from the site and moved to Lodgers road, Duranbah. Later, in the same area, a rainforest area was established. It is unlikely that any archaeological material relating to this structure remains. If present, there may be footings, remains of the timber flooring, sheet metal, fence posts and artefact deposits relating to the daily life of the residences.

The grounds of the Tumbulgum Public School have *low* potential for archaeological resources related to the use of the lot as a school and location of the teacher's residence. Those resources, if realised, would be archaeological fabric in the form of footings, building materials, and artefact-bearing deposits. These resources are predicted to be more likely to survive outside areas of more recent development, however this footprint is quite small. Archaeological resources associated with the late nineteenth century schoolhouse are predicted to be more ephemeral in nature as this area was primarily open play-ground meaning post holes, evidence of gardens, and artefact scatters are expected. The former toilet facilities to the north-east of the school building; however, may survive as a cesspit.

Figure 5.1 illustrates early structures and the areas of highest archaeological potential associated with early phases of the school in the Tumbulgum School curtilage. A summary of the archaeological potential can be found in Table 5.3.

Table 5.3 Summary of archaeological potential in the Project area

Historical Phase	Possible Resources	Disturbance	Archaeological Potential
Phase 1 1879 – 1883 William Baker tenure	Fence posts, farm deposits, agricultural material	High	Low to nil
Phase 2 1883 – 1891 Subdivision	Building footings, fence post, artefactual deposit	High	Low
Phase 3 1872 – 1891 First school	Postholes, foundations, traces of timber floors, cesspits, artefacts related to school life	Moderate to high	Low to nil
Phase 4 1891 - Present	Building footings, foundations, septic tanks, cess pits, underfloor deposits, traces of timber floors, sheet metal, artefacts related to school life	Moderate to high	Low

DRAFT

KEY

- Project site boundary
- Area of archaeological potential

Existing environment

- Major road
- Minor road
- Cadastral boundary

DRAFT

ArchaeologicalPotential

Northern Rivers Recovery Project
Tumbulgum Public School
Archaeological Assessment
Figure 5.1

EMM
creating opportunities

Source: EMM (2024); ABS (2021); DCSSS (2024); ESRI (2024); GA (2009); MetroMap (2024)

0 25 50 m
GDA2020 MGA Zone 56

N

\\emm.local\dfs\e2023\E230642 - Northern Rivers Recovery Project Stage 2\GIS\02_Maps_Tumbulgum\A4004_ArchaeologicalPotential\A4004_ArchaeologicalPotential_20240828_01.aprx 11/09/2024

6 Significance assessment

6.1 The significance framework

In NSW, historical value is ascribed to buildings, places, archaeological sites and landscapes modified in the Australian historical period for purposes other than traditional Aboriginal use. The assessment of heritage significance in NSW is based on the *Burra Charter* (Australia ICOMOS 2013) and further expanded upon in *Assessing Heritage Significance* (Department of Planning and Environment (NSW) 2023). The document lists seven criteria that apply when considering if an item is of state or local heritage significance, which are set out in Table 6.1.

Table 6.1 NSW heritage assessment criteria

Criterion	Explanation
a)	An item is important in the course or pattern of NSW's (or the local area's) cultural or natural history (Historical Significance).
b)	An item has strong or special association with the life or works of a person, or group of persons of importance in NSW's (or the local area's) cultural or natural history (Associative Significance).
c)	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area) (Aesthetic Significance).
d)	An item has a strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons (Social Significance).
e)	An item has the potential to yield information that will contribute to an understanding of NSW's (or the local area's) cultural or natural history (Research Significance).
f)	An item possesses uncommon, rare or endangered aspects of NSW's (or the local area's) cultural or natural history (Rarity).
g)	An item is important in demonstrating the principal characteristics of a class of NSW's (or the local area's) cultural or natural places or environments (Representativeness).

Source: Assessing heritage significance (Department of Planning and Environment 2023, p.21).

6.2 Comparative analysis

The purpose of this comparative analysis is to evaluate the potential significance and heritage value of potential archaeological resources in the curtilage of Condong Public School. The assessment aims to determine the level of rarity, uniqueness, representativeness, and distinctiveness of the archaeological resources associated with school sites, providing insights into its importance in its local context, as well as its broader significance across New South Wales. The State Heritage Inventory served as the source for this information and was limited to listed items that provided enough data to make a fair comparison, leading to the identification of three comparable school buildings, as outlined in Table 6.2.

There have been relatively few archaeological excavations of school related buildings in NSW, and majority of these focus around teacher residences themselves. In most instances, the archaeological relics were identified as being of local significance, having the ability to contribute to an understanding of local developments and schooling.

Unanderra Public School, located in Unanderra NSW is a locally significant school site that was established in 1877. Unanderra Public School was a brick school building that had a teachers residence and associated outdoor

toilet facilities located within the curtilage of the public school. The focus of the archaeological investigation surrounded the Teacher's residence and associated cess pits.

Comparatively to Tumbulgum Public School, at Unanderra Public School, buildings were constructed of bricks laid on solid rock foundations. These foundations of the teachers residence. The chances of archaeological material to survive at Unanderra is much higher than Tumbulgum, as the buildings at Tumbulgum Public School were constructed of timber, and evidence of their removal and relocation is evident in the documentary record. In regards to the toilet facilities at Unanderra, no evidence was found of the cess pits due to later development and disturbance. This would likely be a similar case at Tumbulgum Public School due to the fact that later disturbance activities at the site are seen in the current school grounds.

EMM (2024) conducted an archaeological test excavation at Empire Vale Public School located at Empire Vale, NSW approximately 72 km to the south east of Tumbulgum. EMM excavated a teacher's residence located adjacent to the current school buildings on the eastern boundary of the site. Empire Vale Public School was constructed in 1891, in a former sugar-cane field that was cleared in order to make way for the school. The brick teacher's residence was constructed in 1892, with additions added in 1903. The residence was demolished in 1954 and a new teacher's residence was constructed off site. The test excavation revealed remnants of the former teacher's residence in the form of a dry brick features and possible drain deposits. These remains, due to their fragmentary and disturbed context, did not meet the threshold for local significance.

In relation to Tumbulgum Public School, the area of the teacher's residence has been highly disturbed with the removal and relocation of the residence in 1969 and establishment of the rainforest area in 1991 would have likely highly disturbed any archaeological material, if present, in the area similar to the residence remains at Empire Vale.

EMM (2020) conducted an archaeological salvage excavation across five dwellings in Pyrmont. One of these dwellings was an 1861 schoolmaster's house associated with Pyrmont Public School. Whilst the focus of the excavation surrounded the school house, there were elements of student and every day school life recovered in the underfloor deposits of the site, including slate pencil fragments, buttons, pins, dress hooks and clay pipes that could be dated from the mid-to late nineteenth century. Comparatively to Tumbulgum, it is expected that similar archaeological material of slate pencils, clothing accessories, thimbles and other sewing artefacts may be found in underfloor deposits or areas of archaeological potential relating to the original school building.

Biosis (2010) conducted a historical archaeological monitoring of Parramatta North Public School. The monitoring programmed focused on the residence buildings built for the school in 1890. Artefacts recovered from the excavation provided information about the daily lives and personal tastes of the people who occupied the residences and the school children. Tumbulgum Public School has the potential for artefact deposits to exist on site, and if present they may provided insight to the daily life of children and teachers.

A summary of these comparative sites are provided in Table 6.2.

DRAFT

Table 6.2 Comparative analysis – potential archaeological resources

Item name	Description	Archaeological summary
Former Unanderra Primary School teacher's residence Source: Heritage Concepts (2004), *Results of Archaeological Monitoring Programme: Site of the Former Unanderra Primary School Unanderra, NSW*. Unpublished report prepared for Project Vision International Pty Ltd on behalf of the Woolworths Corporation.	**Site Type**: archaeological **Date**: 1878-c.1960 **Description**: The Former Unanderra Primary School teacher's residence was subject to archaeological investigations by Heritage Concepts in 2003. Excavations found the sandstone foundations of the seven room (five original, two late nineteenth century additions) teacher's residence, which was built in 1878 and demolished c.1960. The residence measured of 18 metres in length and 10.5 metres in width and the footprint corresponded to descriptions in the historical record. Artefact deposits were not found in association with the features, and it is believed deposits were removed during demolition and the stripping of the site to the natural clay. Cesspit and later school toilets were also found but not investigated further. **Significance Summary**: The Former Unanderra Primary School teacher's residence was noted to be of significance for its connection to schooling and as a former historical element in the village core. The archaeological resources associated with the buildings did not contribute further information to increase understanding of the town and region's history beyond the written record. It was argued; however, the resources of the cesspits and water closet may fulfil the criterion if investigated at a later date.	In situ sandstone foundations of the former School Master's Residence, comprising of a single course of large mortared sandstone blocks. No substantial archaeological deposit was recovered as the demolition of the building in 1960 had removed all such deposits down to the natural clay.
Empire Vale Public School Source: EMM (2024), *Archaeological Test Excavation Report – Empire Vale Public School.* Prepared for ADCO Constructions Pty Ltd	**Site Type:** archaeological **Date**:1891 -present **Description:** The former Empire Vale Public School teacher's residence was subject to a test archaeological investigation in 2023 conducted by EMM. Excavations were able to locate a dry-brick-pressed brick feature in the location of the former residence. Potential drain deposits, as part of flood mitigation for the buildings at the school ground, were also uncovered. **Significance Summary:** The excavated archaeological material did not meet the threshold for local significance.	Dry brick feature and drain deposits at the site of a former teacher's residence.

Table 6.2 Comparative analysis – potential archaeological resources

Item name	Description	Archaeological summary
Former Schoolmaster's residence (Harris Street, Pyrmont) Source: EMM (2020b, 2020a) *'New Life' Residential Development Archaeological excavation report 63, 65A & 69-71 Harris Street, Pyrmont, 14-16 Mount Street Pyrmont as per permit approval 2017/S140/05*. Prepared for TWT Developments	**Site Type**: archaeological **Date**: 1891-c.1987 **Description**: Evidence of the Schoolmaster's residence of the former Pyrmont Public School was subject to archaeological investigations by EMM in 2015. Excavations found the sandstone foundations of the residence, which was built in the Federation Queen Anne style in 1891 and demolished c.1987. **Significance Summary**: The Schoolmaster's residence of the former Pyrmont Public School was assessed to be of significance for its connection to local schooling and its representation of population growth of Pyrmont. The archaeological resources associated with the buildings were not deemed significant beyond the ability to contribute further information about the lives of school teachers and school children in Pyrmont over the late nineteenth and twentieth century.	Five dwellings were uncovered, one of which was a 1891 school master's house. Artefacts including slate pencils, smoking pipes, pins, sewing needles and clothing were uncovered that provided insight into the every day life of the students and school master who lived on site.
Parramatta North Public School Source: Biosis Research (2010), *Building the Education Revolution: Historical Archaeological Monitoring of Parramatta North Public School* Volume 1: Excavation Report. Report prepared for Brookfield Multiplex.	**Site Type**: archaeological **Date**: 1882-present **Description**: Biosis Research was engaged by Brookfield Multiplex to conduct a program of archaeological monitoring at Parramatta North Public School. Monitoring of all works requiring ground disturbance was carried out between October 2009 and February 2010. The monitoring program identified artefacts that demonstrate that a range of expected domestic activities occurred within the study area. Artefacts such as ceramics and bottles for the storage, preparation and consumption of food and beverages were identified, as were artefacts related to personal adornment, transport, leisure activities, children and house furniture/building materials. **Significance Summary**: The archaeological investigation at Parramatta North Public School has confirmed that the site is of local significance. There is evidence relating to the historical development of the site from residences to a public education institution. While the investigation has identified that the deposits contain artefacts from all phases of occupation, these are mixed. The artefacts provide basic information regarding the material culture of the occupants, and their significance is primarily associated with their social significance to the local students and their educational value as a tangible link between the past and present. The educational value of the artefacts is recognised by the school personnel who have requested custodianship of the assemblage.	Remnants of various structures including residence buildings, headmaster's residence, WWII trench and a series of artefact deposits.

6.3 Significance assessment

The significance assessment criteria outlined in Table 6.1 are also applied to the assessment of potential archaeological sites, as supported in *Assessing Significance for Historical Archaeological Sites and 'Relics'* (NSW Heritage Branch 2009) and outlined in the 2013 *Burra Charter of Australia* (ICOMOS Australia 2013). Consideration against the seven criteria determines whether an item meets the thresholds of State or local heritage significance. Definitions of archaeological significance are present in Table 6.3 and Table 6.4 assess the significance of potential archaeological resources at Tumbulgum Public School.

Table 6.3 Assessment of archaeological potential against NSW heritage criteria

Criterion	Explanation
Archaeological Research Potential NSW Heritage Criterion E	Archaeological research potential is the ability of archaeological evidence, through analysis and interpretation, to provide information about a site that could not be derived from any other source, and which contributes to the archaeological significance of that site and its 'relics'.
Associations with individuals, events, or groups of historical importance NSW Heritage Criteria A, B, D	Archaeological remains may have associations with individuals, groups and events which may transform mundane places or objects into significant items through their relationship with important historical occurrences.
Aesthetic or technical significance NSW Heritage Criterion C	Whilst the technical value of archaeology is usually considered as 'research potential' aesthetic values are not usually considered to be relevant to archaeological sites. This is often because until a site has been excavated, its actual features and attributes may remain unknown. It is also because aesthetic is often interpreted to mean attractive, as opposed to the broader sense of sensory perception or 'feeling' as expressed in the Burra Charter.
Ability to demonstrate the past through archaeological remains NSW Heritage Criteria A, C, F & G	Archaeological remains have an ability to demonstrate how a site was used, what processes occurred, how work was undertaken and the scale of an industrial practice or other historic occupation. They can demonstrate the principal characteristics of a place or process that may be rare or common.

Source: Assessing Significance for Historical Archaeological Sites and 'Relics' (NSW Heritage Branch, 2009, p.11).

Table 6.4 Statement of significance – archaeological resources

Phase	Assessment
Phase 1 1879 – 1883 William Baker tenure	Phase 1 archaeological resources are considered highly unlikely to be present at Tumbulgum Public School as there were no known structures on the site during this period. In addition, there has been substantial subsequent land disturbance. Any possible traces of Phase 1 activity would be expected to be highly ephemeral and limited in nature. If present, archaeological resources are unlikely to demonstrate the principal characteristics of activities that were undertaken, or hold associations with individuals that would be of significance. However, archaeological resources could inform the site history in ways that could not be derived from other sources and that could present further research potential. **Phase 1 archaeological resources could meet the threshold for 'relics' under NSW heritage assessment criteria, however very limited potential (nil – low) has been identified for any such resources to exist at Tumbulgum Public School.**

DRAFT

Phase	Assessment
Phase 2 1883 – 1891 Subdivision	Archaeological resources relating to Phase 2 occupation of the site are unlikely to be present at Tumbulgum Public School. The only documented structure located on site during this period was a cottage belonging to a Mr Norton. The structure was demolished in 1890 and subsequent impacts to the area have been noted. If subsurface archaeological resources relating to this phase were realised, they could inform the site history and local town history of Tumbulgum and could present further research potential. **Phase 2 archaeological resources could meet the threshold for 'relics' under NSW heritage assessment criteria, however very limited potential has been identified for any such resources to exist in the project area.**
Phase 3 1872 – 1891	The weathershed structure that served as the original school building prior to the construction of the current classroom, existed in the middle of the Tumbulgum Public School grounds. It was removed in 1956 due to its deteriorating nature and because it was no longer fit for purpose. The area in which it existed has been impacted by the construction of a hard court and temporary school classrooms. If subsurface archaeological resources relating to this phase existed, it would unlikely be able to demonstrate principal characteristics of activities that were undertaken, or hold associations with individuals that would be of significance. **Phase 3 archaeological resources are unlikely to meet the threshold for 'relics' under NSW heritage assessment criteria.**
Phase 4 1891 - Present	Low archaeological potential has been identified for Phase 4 archaeological resources. These include former teacher's residence, underfloor artefact deposits, cess pits and toilet blocks. If subsurface archaeological resources relating to this phase were realised, they could inform the site history and local town history of Tumbulgum and could present further research potential. **Phase 4 archaeological resources could meet the threshold for 'relics' under NSW heritage assessment criteria, however there is a low potential for resources and these archaeological materials, if present, would be in areas of high disturbance impacting their integrity and intactness and therefore their ability to answer substantive research questions.**

6.4 Summary of historical archaeological potential

In consideration of the site history and above assessment of archaeological potential and significance, the revised summary of archaeological potential is provided in Table 6.5

Table 6.5 Summary of archaeological potential in the Proposal area

Historical Phase	Archaeological Potential	Possible Resources	Potential Significance
Phase 1 1879 – 1883 William Baker tenure	Low to nil	Fence posts, farm deposits, agricultural material	Local
Phase 2 1883 – 1891 Subdivision	Low	Building footings, fence post, artefactual deposit	Local
Phase 3 1872 – 1891 First school	Low to nil	Postholes, foundations, traces of timber floors, cesspits, artefacts related to school life	Unlikely to meet threshold for local significance
Phase 4 1891 - Present	Low	Building footings, foundations, septic tanks, cess pits, underfloor deposits, traces of timber floors, sheet metal, artefacts related to school life	Local

DRAFT

7 Assessment of the Project

7.1 Heritage values

Tumbulgum Public School contains built heritage values associated with the 1893 school building and the Cudgera Creek school building. The impacts to the built heritage significance are being addressed under a statement of heritage impact.

Research and site inspection suggests there is a low potential for archaeological sites associated with the pre-establishment of the school phases to survive on the project area. Should they be present, these resources are likely to be of local significance and, depending on their integrity, nature and extent, may meet the definition of 'relic' under the *Heritage Act, 1997*. Additionally, it has been found there is low potential for archaeological resources of heritage significance associated with the early years of the current school to survive within the curtilage of Tumbulgum Public School. These resources have been assessed as not being of heritage significance and would not meet the threshold for relics under the *Heritage Act 1977*.

7.2 Project description

Due to flood damage, the 1893 building is set to be demolished with existing administration building, canteen, learning spaces and hard court play areas. Two new school buildings will be built with associated services and new play areas and gardens installed. The scope of works for this project ha

The project impacts are shown on Figure 7.1.

7.3 Archaeological impacts

Through documentary research, the school may hold potential for archaeological resources, although this has been assessed as low. These archaeological resources, if realised, will likely to be highly disturbed. Depending on the nature, extent and integrity of these recourses, they could meet the threshold for local significance for relics under the *Heritage Act 1977* but it is considered unlikely. The location of these areas of archaeological potential are shown on Figure 5.1.

DRAFT

KEY

- Project site boundary
- Area of archaeological potential

Existing environment

- Minor road
- Cadastral boundary

Source: EMM (2024); DCSSS (2024); MetroMap (2024); ADCO (2024)

0 25 50 m

GDA2020 MGA Zone 56

N

Proposed project impacts

Northern Rivers Recovery Project
Tumbulgum Public School
Statement of Heritage Impact
Figure 7.1

EMM
creating opportunities

\\emm.local\dfs\au\2024\EP306472_Northern_Rivers_Recovery_Project_Stage_2\GIS\02_Maps_Tumbulgum\WP005_ProposedProjectImpacts\WP005_ProposedProjectImpacts_20240828_01.aprx 11/09/2024

8 Recommendations and Conclusions

SINSW proposed to redevelopment to Tumbulgum Public School as part of the Northern NSW Schools groups impacted by the floods of early 2022. The proposed works include the demolition of damaged buildings and construction of new school buildings and facilities in order to allow students and staff members to attend Tumbulgum Public School. A statement of heritage impact (SoHI) has been separately prepared by EMM (2024) to address the built heritage and movable heritage components of this project.

This report has assessed the potential archaeological resources within the project area and determined that archaeological resources may exist in the project area. These archaeological resources are likely to have been highly disturbed due to the ongoing use of the school since 1891. The archaeological material may meet the threshold for local significance, however this has been overall assessed as low potential across each of the phases across the site.

The following management measures applies to the project:

- The Unexpected Finds Procedure, Northern Rivers Flood Recovery Project provided by EMM be integrated into the Construction Environmental Management Plan (CEMP) and implemented in the event that archaeological resources are identified during construction.

DRAFT

References

Australian Town and Country Journal. 1881. "On the Tweed." *Australian Town and Country Journal (Sydney, NSW : 1870 - 1907)*, December 10, 26.

Boileau, Joanna. 2004. *Tweed Shire Council Community Based Heritage Study: Thematic History*. Unpublished report for Tweed Shire Council.

Breckenridge, Susanne. 1997. *Tumbulgum Tales: Tumbulgum Primary School 125 Years Reunion 1872 - 1997*.

Department of Planning and Environment (NSW). 2023. *Assessing Heritage Significance*. Parramatta, NSW: Environment and Heritage, Department of Planning and Environment (NSW).

Division of Research and Planning, and Department of Education. 1962. "Tumbulgum Public School." *Historical Accounts of Schools, Sydney : Schools and Colleges, T-V.* (T-V).

EMM. 2022. *Review of Environmental Factors: PR471 Construction of 132kV Aerotropolis Feeder from Orchard Hills to Luddenham (Stages 4-7)*. Sydney: Unpublished report for Endeavour Energy, September 2022.

EMM Consulting. 2020a. *New Life Development Pyrmont - Artefact Analysis 65A, 69-70 Harris Street and 14-16 Mount Street Pyrmont*. Sydney: Unpublished report for TWT Developments.

EMM Consulting. 2020b. *"New Life" Residential Development: Archaeological Excavation Report 63, 65A & 69-71 Harris Street, Pyrmont, 14-16 Mount Street Pyrmont as per Permit Approval 2017/S140/05*. Sydney: Unpublished report for TWT Developments.

EMM Consulting Pty Ltd. 2024. *Archaeological Test Excavation Report Empire Vale Public School*.

Gahan, Kate. 2004. *Wardell Community Based Heritage Study*.

Heritage NSW. 2022. "Relics of Local Heritage Significance: A Guide for Archaeological Test Excavation."

ICOMOS (Australia). 2013. *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*. Burwood, Victoria, Victoria: Australia ICOMOS.

Lismore City Council. 2024. "Lismore's History: WW1 and WW2." *Lismore City Council Online*. Retrieved May 8, 2024 (https://www.lismore.nsw.gov.au/Community/Lismores-history/WW1-and-WW2).

New South Wales Government Gazette. 1891. "Works in Connection with Public Schools." *New South Wales Government Gazette (Sydney, NSW : 1832 - 1900)*, April 17, 2813.

NSW Government. n.d. "Glossary of School Types." *History of New South Wales Govenment Schools*. Retrieved September 4, 2022a (https://education.nsw.gov.au/about-us/our-people-and-structure/history-of-government-schools/school-database-search/glossary).

NSW Government. n.d. "School History Database Search." *History of NSW Government Schools*. Retrieved (https://education.nsw.gov.au/about-us/our-people-and-structure/history-of-government-schools/school-database-search).

NSW Heritage Branch. 2009. *Assessing Significance for Historical Archaeological Sites and 'Relics.'* Parramatta: NSW Heritage Office.

NSW Land Registry Service. n.d. "No Title." *Historical Land Records Viewer*. Retrieved (https://hlrv.nswlrs.com.au/).

Sharpe, Margaret C. 1985. "Bundjalung Settlement and Migration." *Aboriginal History* 9(1):101–24.

State of NSW. 2022. *Schedule of Exceptions to Subsections 139(1) and (2) of the Heritage Act 1977*. Vol. 59. Sydney: State of NSW.

Tindale, Norman B. 1974. *Aboriginal Tribes of Australia: Their Terrain, Environmental Controls, Distribution, Limits and Proper Names*. Canberra, A.C.T.: Australian National University Press.

Tumbulgum Community Association. n.d. "Tumbulgum History: Our Past, Present, Future." Retrieved September 1, 2022 (https://tumbulgum.wordpress.com/our-past-present-and-future/).

Tweed Daily. 1936. "Tumbulgum." *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, March 30, 6.

Tweed Daily. 1937. "Local and General." *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, December 22, 4.

DRAFT

Tweed Daily. 1941. “Concrete Assembly Area for Tumbulgum School.” *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, May 16, 4.

Tweed Daily. 1942a. “Local and General.” *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, March 13, 2.

Tweed Daily. 1942b. “Tumbulgum School Fencing.” *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, February 11, 2.

Tweed Daily. 1944. “Tumbulgum P. and C. Annual Meeting.” *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, March 31, 2.

Tweed Daily. 1945. “In Country Centres.” *Tweed Daily (Murwillumbah, NSW : 1914 - 1949)*, June 13, 4.

Tweed Shire Council. 2018. *Tweed Shire Council Aboriginal Cultural Heritage Management Plan 2018*.

Tweed Shire Council, and Tumbulgum Community Association. 2013. “Tumbulgum Public School Est 1872.”

DRAFT

DRAFT

Australia

SYDNEY
Ground floor, 20 Chandos Street
St Leonards NSW 2065
T 02 9493 9500

NEWCASTLE
Level 3, 175 Scott Street
Newcastle NSW 2300
T 02 4907 4800

BRISBANE
Level 1, 87 Wickham Terrace
Spring Hill QLD 4000
T 07 3648 1200

CANBERRA
Level 2, Suite 2.04
15 London Circuit
Canberra City ACT 2601

ADELAIDE
Level 4, 74 Pirie Street
Adelaide SA 5000
T 08 8232 2253

MELBOURNE
188 Normanby Road
Southbank VIC 3006

PERTH
Level 9, Suite 9.02
109 St Georges Terrace
Perth WA 6831

Canada

TORONTO
2345 Yonge Street, Suite 300
Toronto ON M4P 2E5

VANCOUVER
60 W 6th Ave Suite 200
Vancouver BC V5Y 1K1

linkedin.com/company/emm-consulting-pty-limited

emmconsulting.com.au